

Also Submitted via email →

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California Environmental Protection Agency
Attn: Climate Change Committee
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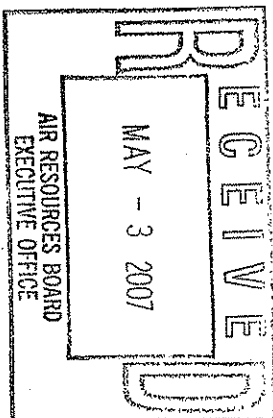
RE: Comments on the draft report "Climate Action Team Proposed Early Actions to Mitigate Climate Change in California"

Dear Climate Action Team Members:

GeoPraxis greatly appreciates the opportunity to comment on the "Climate Action Team Proposed Early Actions to Mitigate Climate Change in California" draft report. In the midst of the media's plethora of bad news on climate change, it is extremely encouraging to see California painstakingly itemize these many leading edge policy initiatives that will be needed to address this challenge. Thank you to all who have contributed to this critically important effort.

My comments on the draft report are as follows:

1. The CAT Report should state the 1990 MMTCO₂E emissions baseline and estimate the goals in MMTCO₂E (2010, 2020, & 2050).
2. The CAT Report should include a summary table itemizing all group agency actions (similar to the table provided in the companion CARB Report). This table would list and sum separate columns for those 2020 estimated impacts which derive from regulations which have already taken effect (e.g. CALTRANS Concrete, New Solar, Homes Partnership, etc). versus those still under development.
3. CAT Report should be finalized 1 – 2 days after CARB Report to ensure CAT Report includes summary of CARB data (rather than just referencing the other report).
4. New Solar Homes Partnership GHG impacts should be estimated as soon as possible and included in final CAT Report.
5. CPUC 2006 – 2008 IOU programs should be listed as a Group 1 impact.
6. As CEC and CPUC appear to have done already, cooperating agencies should allocate their respective agency-specific savings estimates for purposes of



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reporting. Each agency submitting GHG emissions savings estimates should confirm and certify that its estimates are not double-counted (e.g. SCSA/DGS cite multiple initiatives that may also be co-funded in CPUC IOU portfolio – any such allocation issues should be fully resolved prior to the Final Report).

7. Report should clarify or reallocate CEC Group 1 versus Group 2 impacts (e.g. appliance standards) to confirm same impacts are not double-counted.
8. Under the Integrated Waste Management Board (IWMB) section, Zero Waste High Recycling Strategy estimates 3 and 5 MMTCO₂E by 2020. Is this two initiatives or is 3 tons included in 5? Please clarify in Final Report.
9. Regarding the CPUC "Transmission Infrastructure" strategy, the CAT Report should move this to Group 3 or clarify that any GHG reduction estimates associated with this strategy will be properly apportioned with the renewable generation sources (and thus not double-counted).
10. Regarding the CPUC "additional RPS" strategy, the CAT Report should add a sentence to clarify that the 11 MMTCO₂E estimate is due to the incremental additional reduction associated with an increased RPS of 33% (above 20%).

Thank you again for the opportunity to submit these comments. Please contact me with any questions you might have.

Sincerely,



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President

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